

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

PETER IKAI VAN NOPPEN, Individually  
and On Behalf of All Others Similarly  
Situated,

Plaintiff,

VS.

INNERWORKINGS, INC., ERIC D.  
BELCHER, and JOSEPH M. BUSKY,

Defendants.

Case No. 1:14-cv-01416

Hon. John Robert Blakey

## CLASS ACTION

**NOTICE OF LEAD COUNSEL’S MOTION FOR AN AWARD OF ATTORNEYS’  
FEES AND PAYMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that Lead Counsel Labaton Sucharow LLP (“Lead Counsel”), on behalf of itself and Liaison Counsel Cohen Milstein Sellers & Toll PLLC, will move this Court on October 13, 2016 at 9:45 a.m., in Courtroom 1725, for an Order, pursuant to Rule 23(h) of the Federal Rules of Civil Procedure: (a) awarding attorneys’ fees in the amount of 30% of the Settlement Fund; (b) awarding litigation expenses in the amount of \$124,535.43, plus accrued interest; and (c) such other and further relief as this Court deems just and proper.

Lead Counsel is contemporaneously herewith filing a memorandum of law and the Declaration of Jonathan Gardner in Support of Lead Plaintiff's Motion for Final Approval of Class Action Settlement and Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses, dated September 6, 2016, with annexed exhibits, in support of this motion.

A proposed order will be submitted on October 5, 2016 with Lead Counsel's reply papers, after the deadline for objecting has passed.

Dated: September 6, 2016

Respectfully submitted,

By: /s/ Jonathan Gardner

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*Liaison Counsel for the Class*

**CERTIFICATE OF SERVICE**

I, Jonathan Gardner, certify that on this 6th day of September, 2016, I electronically filed this Notice of Lead Counsel's Motion for an Award of Attorneys' Fees and Payment of Litigation Expenses with the Clerk of the U.S. District Court using the CM/ECF system which will be sent electronically to the registered participants as identified on the attached Electronic Mail Notice List.

s/ Jonathan Gardner

Jonathan Gardner

**Mailing Information for a Case 1:14-cv-01416**

***Van Noppen v. InnerWorkings, Inc. et al***

**Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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**Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

☐ (No manual recipients)